



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO IL 60604 3590

US EPA RECORDS CENTER REGION 5



452079

March 10 2010

Leslie R Schenck
GARVEY SCHUBERT BARER
Eighteenth floor
1191 Second avenue
Seattle Washington 98101 2939

REPLY TO THE ATTENTION OF

Re Reclamation Oil Superfund Site (Site) Detroit Michigan

Dear Ms Schenck

As you know I sent a letter to Bill Schikora earlier today regarding the above referenced Site This letter is essentially a duplicate of that letter but I want to make sure that the correct parties receive it Enclosed please find a copy of the March 1 2010 Site Assessment for the Reclamation Oil Superfund Site (Site) which was recently completed by Weston Solutions Inc as contractor to EPA As indicated in the Site Assessment there are several salient points I would like to highlight

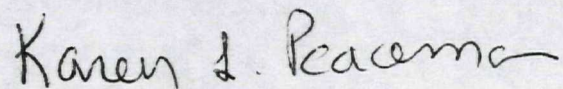
- There are several contaminants in the soil throughout the Site which exceed both the Michigan Department of Natural Resources and Environment (MDNRE) Part 201 Criteria for Residential and Commercial I Direct Contact (RDCC) and for Industrial/Commercial II Direct Contact (ICDC)
- The total volume of contaminated soil is approximately 5 120 cubic yards
- Most of the contaminated soil would be considered a non hazardous waste and
- There were elevated VOC LEL and methane concentrations in the monitoring wells indicating the potential for toxic and explosive gas migration

EPA is currently in the process of completing its Action Memorandum for this Site I expect EPA to select a removal action largely consisting of removing the contaminated soil and disposing of it off site Capping the Site (instead of removing the contaminated soil) now appears to be even more problematic than we thought previously given the high levels of VOCs and methane gases present EPA now anticipates that if EPA were to conduct this removal action we would ask for authorization to spend just slightly more than \$1 000 000 on the work

We would like to extend a limited amount of time for the Reclamation Oil PRP Group (Group) to review the Site Assessment and to determine if the Group would like to now agree to do the removal work required at the Site Therefore we will give the Group until March 25 2010 to let us know if you are interested in negotiating an administrative order to perform the work If the Group declines to do the work EPA will evaluate all of its options including issuing a Unilateral Order to the Group or doing the work as a Fund lead matter and pursuing the Group in cost recovery

Please do not hesitate to contact me at 312-353-5751 if you have any questions or wish to discuss this matter.

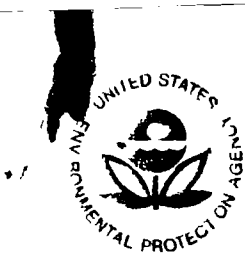
Very truly yours,

A handwritten signature in dark ink, reading "Karen L. Peaceman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Karen L. Peaceman
Associate Regional Counsel

Enclosure

cc: Tricia Edwards, U.S. EPA
Kaushalya Khanna, U.S. EPA



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CHICAGO IL 60604 3590

March 10 2010

William R. Schikora
Dykema Gossett PLLC
400 Renaissance Center
Detroit Michigan 48243

REPLY TO THE ATTENTION OF

Re Reclamation Oil Superfund Site (Site), Detroit Michigan

Dear Mr. Schikora

Enclosed please find a copy of the March 1 2010 Site Assessment for the Reclamation Oil Superfund Site (Site) which was recently completed by Weston Solutions Inc. as contractor to EPA. As indicated in the Site Assessment, there are several salient points I would like to highlight:

- There are several contaminants in the soil throughout the Site which exceed both the Michigan Department of Natural Resources and Environment (MDNRE) Part 201 Criteria for Residential and Commercial I Direct Contact (RDCC) and for Industrial/Commercial II Direct Contact (ICDCC)
- The total volume of contaminated soil is approximately 5 120 cubic yards
- Most of the contaminated soil would be considered a non hazardous waste and
- There were elevated VOC LEL and methane concentrations in the monitoring wells indicating the potential for toxic and explosive gas migration

EPA is currently in the process of completing its Action Memorandum for this Site. I expect EPA to select a removal action largely consisting of removing the contaminated soil and disposing of it off-site. Capping the Site (instead of removing the contaminated soil) now appears to be even more problematic than we thought previously given the high levels of VOCs and methane gases present. EPA now anticipates that if EPA were to conduct this removal action, we would ask for authorization to spend just slightly more than \$1 000 000 on the work.

We would like to extend a limited amount of time for the Reclamation Oil PRP Group (Group) to review the Site Assessment and to determine if the Group would like to now agree to do the removal work required at the Site. Therefore, we will give the Group until March 25 2010 to let us know if you are interested in negotiating an administrative order to perform the work. If the Group declines to do the work, EPA will evaluate all of its options, including issuing a Unilateral Order to the Group or doing the work as a Fund lead matter and pursuing the Group in cost recovery.

Please do not hesitate to contact me at 312 353-5751 if you have any questions or wish to discuss this matter.



Please do not hesitate to contact me at 312-353-5751 if you have any questions or wish to discuss this matter

Very truly yours

A handwritten signature in black ink that reads "Karen L. Peaceman". The signature is fluid and cursive, with a long horizontal flourish at the end.

Karen L. Peaceman
Associate Regional Counsel

Enclosure

cc Tricia Edwards U S EPA
Kaushalya Khanna U S EPA

